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Attorneys for Defendant
Mr. Kinney

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:23-cr-00318-DC
)
Plaintiff,) STIPULATION AND ORDER TO CONTINUE
) JUDGMENT AND SENTENCING
vs.)
) Date: September 19, 2025
JOSEPH PAUL HERRERA) Time: 9:30 a.m.
KINNEY,) Judge: Hon. Dena Coggins
)
<u>Defendant.</u>)

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Eric Grant, through Assistant United States Attorney Justin Lee, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joseph Paul Herrera Kinney, that the previously scheduled Judgment and Sentencing set for September 19, 2025 be continued to **September 26, 2025 at 9:30 a.m.**

The parties specifically stipulate as follows:

1. Mr. Kinney requests the continuance to be adequately prepared for Judgment and Sentencing. He plans to file a Sentencing Memorandum but has not yet done so.
2. The government does not object to his request.
3. U.S. Probation is available on the requested date and time.
4. The parties jointly request the new sentencing schedule as follows:

1	Draft PSR	completed
2	Informal Objections	completed
3	Final PSR	completed
4	Formal Objections	completed
5	Response to Formal Objections	completed
6	Judgment and Sentencing	September 26, 2025 at 9:30 a.m.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: September 12, 2025

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Kinney

Date: September 12, 2025

ERIC GRANT
United States Attorney

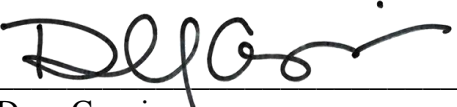
/s/ Justin Lee
JUSTIN LEE
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The court, having received, read and considered the parties' stipulation and good cause appearing therefrom, GRANTS the parties' request to continue. Accordingly, the Sentencing Hearing scheduled for September 19, 2025, is VACATED and RESET for September 26, 2025, at 9:30 a.m. in Courtroom 10 before the Honorable Dena M. Coggins. All briefing related to the Sentencing Hearing shall be submitted no later than 12:00 PM (Noon) on September 18, 2025.

IT IS SO ORDERED.

Dated: September 15, 2025


Dena Coggins
United States District Judge